

Marc A. Rapaport
Rapaport Law Firm, PLLC
One Penn Plaza, Suite 2430
New York, New York 10119
(212) 382-1600

Counsel to Juan Quispe, Robert Cespedes, Joel Peruano, Robert Davila, Paul Medina, Jose Orocaja, Jose Polo, Jordan Soplopucio, Francisco Pastrana, Julio E. Rios, Jean Norena, Roselo Rodriguez, Wilman Argueta, Walter Pacheco, Crey Bonillo, Jonathan Bonillo, Leonardo Castillo, Oscar Brito, Luis Tamay and Lucas Diaz Pereira

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

In re

MEC GENERAL CONSTRUCTION CORP.,

Debtor.

Chapter 7

Case No.: 19-43106 (CEC)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that Rapaport Law Firm, PLLC, hereby appears in the above-captioned chapter 7 case as counsel for Juan Quispe, Robert Cespedes, Joel Peruano, Robert Davila, Paul Medina, Jose Orocaja, Jose Polo, Jordan Soplopucio, Francisco Pastrana, Julio E. Rios, Jean Norena, Roselo Rodriguez, Wilman Argueta, Walter Pacheco, Crey Bonillo, Jonathan Bonillo, Leonardo Castillo, Oscar Brito, Luis Tamay, and Lucas Diaz Pereira (collectively, the “*Quispe Plaintiffs*”), creditors and parties in interest herein, pursuant to Rules 2002, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure (as amended, the “*Bankruptcy Rules*”), and requests that copies of any and all notices and papers filed or entered in these cases and all papers served or required to be served in these cases be given to and served upon the following:

Marc A. Rapaport
Rapaport Law Firm, PLLC
One Penn Plaza, Suite 2430
New York, New York 10119
mrpaport@rapaportlaw.com
Phone: (212) 382-1600
Fax: (212) 382-0920

PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any petition, pleading, complaint, conference, hearing, application, motion, request, or demand (collectively, the “*Filings*”), whether formal or informal, written or oral, or transmitted or conveyed by mail, delivery, telephone, telecopy, or otherwise which affect or seek to affect in any way any rights or interests of the Quispe Plaintiffs.

PLEASE TAKE FURTHER NOTICE that the filing of this Notice of Appearance shall not constitute (a) a waiver of rights to have any and all final orders in any and all non-core matters entered only after *de novo* review by a United States District Court; (b) a waiver of rights to trial by jury in any proceeding as to any and all matters so triable; (c) a waiver of rights to have the reference withdrawn by the United States District Court in any matter or proceeding subject to mandatory or discretionary withdrawal; (d) a waiver of any rights, claims actions, defenses, setoffs, or recoupments; or (e) a consent by the Quispe Plaintiffs to the jurisdiction of the United States Bankruptcy Court for the Southern District of New York with respect to any proceeding commenced in these cases against or otherwise involving the Quispe Plaintiffs, all of which rights and consents the Quispe Plaintiffs expressly reserve.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request for Service of Papers shall not be construed as an appointment of any person or entity as authorized

agents of the Quispe Plaintiffs, either expressly or impliedly, for purposes of receiving service of process pursuant to Rule 7004 of the Bankruptcy Rules or Rule 4 of the Federal Rules of Civil Procedure.

Date: July 24, 2019
New York, New York

RAPAPORT LAW FIRM, PLLC

/s/ Marc A. Rapaport
One Penn Plaza, Suite 2430
New York, New York 10119
mrpaport@rapaportlaw.com
Phone: (212) 382-1600
Fax: (212) 382-0920

Counsel for Juan Quispe, Robert Cespedes, Joel Peruano, Robert Davila, Paul Medina, Jose Orocaja, Jose Polo, Jordan Soplopucio, Francisco Pastrana, Julio E. Rios, Jean Norena, Roselo Rodriguez, Wilman Argueta, Walter Pacheco, Crey Bonillo, Jonathan Bonillo, Leonardo Castillo, Oscar Brito, Luis Tamay, Lucas Diaz Pereira

CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of July, 2019, a copy of the foregoing Notice of Appearance and Request for Service of Papers was duly served on all parties receiving electronic notification in these cases from the Court ECF system.

/s/ Marc A. Rapaport
Marc A. Rapaport